

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

YIEN-KOO KING,

Plaintiff,

-against-

ANDREW WANG, SHOU-KUNG WANG, BAO WU  
TANG, JIAN BAO GALLERY, ANTHONY CHOU,  
CHEN-MEI LIN, WEI ZHENG, YE YONG-QING, YUE  
DA-JIN and JOHN DOES 1-9,

Defendants.

1:14-Civ-07694-(LJL)(JLC)

DECLARATION OF TIMOTHY SAVITSKY IN FURTHER SUPPORT OF  
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Timothy Savitsky, Esq. hereby declares pursuant to 28 U.S.C. § 1746, under penalties of perjury as follows:

1. I am a member of the Bar of this Court in good standing and an attorney at Sam P. Israel, P.C., counsel to plaintiff Yien-Koo King (the "**Plaintiff**") in this action. I submit this declaration based upon my personal knowledge to place before the Court certain facts and documents in further support of the Plaintiff's Motion for Partial Summary Judgment and in further opposition to the Defendants' Motion for Summary Judgment.

2. Attached hereto as Exhibit 107 is a true and correct copy of the Expert Rebuttal Report of Patrick Regan dated December 16, 2019.

Dated: New York, New York  
May 4, 2020

/s/ Timothy Savitsky  
Timothy Savitsky, Esq.  
*Counsel for Plaintiff Yien-Koo Wang King*